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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SUZANNE SAVEDRA YOUNGBLOOD,

CIV S 02 2387 DFL KJM P

Petitioner,

vs.

AFFIDAVIT AND ORDER
FOR ENLARGEMENT OF TIME
AND PETITIONER'S
LITIGATION PLAN

PLACER COUNTY PROBATION DEPARTMENT,

Respondent.

CATHERINE CAMPBELL declares under penalty of perjury as follows:

I am appointed counsel for petitioner, Suzanne Savedra Youngblood in the case of *Youngblood v. Placer County Probation Department* (CIV-S-02-2387 DFL JFM P). I was appointed in this matter on December 21, 2005.

The petitioner filed a Petition for Writ of Habeas Corpus on October 30, 2002.

The respondent filed an Answer to the Petition for Writ of Habeas Corpus on March 18, 2003.

On April 15, 2003, petitioner, proceeding in propria persona, filed a lengthy document which was apparently a response to the Answer filed by respondent, but which fails to meet and argue the legal issues raised in the Answer. It was an unlabeled document.

On November 25, 2003, petitioner, still in propria persona, filed a lengthy document which appeared to be a Request to Expand the Evidence received by the Court. On December 17, 2003, the respondent filed an opposition to petitioner's Request to Expand

Affidavit & Order Re: Petitioner's Litigation Plan

1 the Evidence. On December 22, 2003, petitioner filed a letter with the Court in support of
2 her request to expand the record.

3 Counsel for petitioner has now read the entire record, and makes the following
4 request of the Court.

5 That she be granted until May 5, 2006 to file an Amended Traverse to the Answer
6 to the Petition for Writ of Habeas Corpus. The legal issues before the court are complex
7 and novel and counsel needs this much time to do necessary research and writing.

8 On petitioner's behalf counsel hereby submits on the issue of the Request for
9 Expansion of the Evidence.

10 This briefing schedule has the consent of opposing counsel

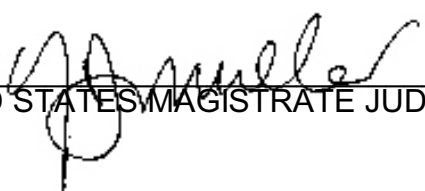
11 Dated: 3/31/06

12 /s/ Catherine Campbell

13 _____
14 CATHERINE CAMPBELL
15 Attorney for Petitioner
16 Suzanne Savedra Youngblood

17 IT IS SO ORDERED. The matter of Petitioner's Request for Expansion of the Evidence
18 filed November 25, 2003, and opposed on December 17, 2003 is denied without prejudice
19 to renewal by petitioner's counsel with petitioner's traverse. Petitioner has until May 5,
20 2006 to file a Traverse and a motion to expand the record.

21 DATED: April 4, 2006.

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24 UNITED STATES MAGISTRATE JUDGE
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